

Joseph R. Saveri
Steven N. Williams
JOSEPH SAVERI LAW FIRM, INC.
601 California Street, Suite 1000
San Francisco, California 94108
Phone: (415) 500-6800
Fax: (415) 395-9940
jsaveri@saverilawfirm.com
swilliams@saverilawfirm.com

COHEN & GRESSER LLP
Melissa H. Maxman (*Pro Hac Vice* to be submitted)
Erica C. Lai (SBN 261787)
2001 Pennsylvania Ave, NW, Suite 300
Washington, DC 20006
Phone: (202) 851-2070
Fax: (202) 851-2081
mmaxman@cohengresser.com
elai@cohengresser.com

ANDREW J. McGUINNESS, ESQ.
Andrew J. McGuinness (*Pro Hac Vice* to be submitted)
122 S Main St., Suite 118
P.O. Box 7711
Ann Arbor, MI 48107
Phone: (734) 274-9374
Fax: (734) 786-9935
drewmcg@topclasslaw.com

Counsel for Intervenor Plaintiffs
DOUGLAS KING and GEORGE FELDMAN

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

IN RE CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION

THIS DOCUMENT RELATES TO ALL
INDIRECT PURCHASER ACTIONS

MDL No. 1917

Case No. 07-cv-5944 JST

**DECLARATION OF JOSEPH R. SAVERI
IN SUPPORT OF INTERVENOR
PLAINTIFFS' NOTICE OF MOTION AND
MOTION TO INTERVENE**

Hearing Date: February 28, 2019

Time: 2:00 p.m.

Courtroom: 9, 19th Floor

Judge: Honorable Jon S. Tigar

MDL No. 1917
Case No. 07-cv-5944 JST

JUDGE: HONORABLE JON S. TIGAR

1 I, Joseph R. Saveri, declare and state as follows:

2 1. I am the founder of the Joseph Saveri Law Firm, Inc. ("JSLF"), and I am a member in good
3 standing of the State Bar of California. I am over 18 years of age and have personal knowledge of the
4 facts stated in this Declaration. If called as a witness, I could and would testify competently to them. I
5 make this declaration pursuant to 28 U.S.C. § 1746

6 2. I make this Declaration in support of Intervenor Plaintiffs' Notice of Motion and Motion to
7 Intervene in the Indirect Purchaser Plaintiffs ("IPP") Actions.

8 3. JSLF has investigated, prosecuted, and successfully resolved numerous antitrust class actions
9 such as this one. Some of these cases include *In re Capacitors Antitrust Litig.*, MDL No. 1917, 3:14-cv-
10 03264-JD (N.D. Cal.), *In re Titanium Dioxide Antitrust Litig.*, RDB-10-0318 (D. Md.), *In re High-Tech*
11 *Employee Antitrust Litig.*, 11-cv-2509-LHK (N.D. Cal.), and *In re Cipro Cases I & II*, (San Diego Cty.
12 Super. Ct. Nos. JCCP 4154/4220. As lead or co-lead counsel in these cases, I have taken a personal
13 leadership role in organizing the litigation, setting strategy, establishing and directing teams of lawyers
14 and assigning specific tasks to teams of attorneys in a way that ensures the efficient use of resources and
15 maximizes the talents of the litigation team. I have negotiated numerous settlements in complex cases,
16 including antitrust cases and other class actions.

17 4. Over the past decade, my partner Steven N. Williams has played a lead role in many prominent
18 antitrust class cases. These include *In re Automotive Parts Antitrust Litig.*, MDL No. 2311 (E.D. Mich)
19 (largest ever recovery in an indirect purchaser class action) and *Wortman v. All Nippon Airways*, 854
20 F.3d 606 (9th Cir., 2017) and *E. & J. Gallo Winery v. WD Energy*, 503 F.3d 1027 (9th Cir. 2007) two
21 groundbreaking cases which expanded the power of federal courts to consider damage claims in
22 antitrust cases involving regulated industries.

23 5. JSLF has been widely acknowledged for excellence in the field of complex litigation, including
24 antitrust cases. The firm and its lawyers have received awards and accolades from numerous
25 organizations and entities, including the American Antitrust Institute, Chambers USA, Martindale
26 Hubbell, and *Super Lawyers*. They lecture and write on many topics, are actively involved in numerous
27 legal organizations, are multi-lingual and from diverse backgrounds, and are active in various *pro bono*
28 activities. Additional information on the firm can be found at <https://saverilawfirm.com>.

7. Attached hereto as Exhibit B is a true and correct copy of a photograph of the label affixed to a television set purchased by Intervenor Plaintiff Douglas King in Anne Arbor, Michigan. Mr. King has not opted out of the certified IPP class.

7 I declare under penalty of perjury that the foregoing is true and correct, and this Declaration is
8 executed at San Francisco, California on January 11, 2019.

10 By: /s/ Joseph R. Saveri
Joseph R. Saveri

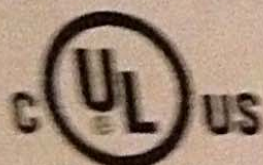
Exhibit A

Thomson multimedia Inc.
10330 NORTH MERIDIAN STREET
INDIANAPOLIS, IN 46230-1024

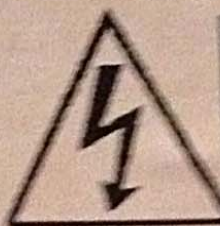
GE

Thomson multimedia Ltd
6200 Edwards Blvd.
MISSISSAUGA, ONT. L6T

LISTED TV
RECEIVER/RECEPTEUR



336H E7916



WARNING/AVERTISSEMENT

RISK OF ELECTRIC SHOCK. DO NOT OPEN
RISQUE DE CHOC ELECTRIQUE NE PAS OUVRIR

COMPLIES WITH FDA RADIATION PERFORMANCE STANDARDS 21 CFR SUBCHAPTER J. THIS DEVICE COMPLIES WITH PART 15 OF THE FCC RULES. OPERATION IS SUBJECT TO THE CONDITION THAT THIS DEVICE DOES NOT CAUSE HARMFUL INTERFERENCE. CABLE COMPATIBLE TELEVISION APPARATUS, CANADA. CONFORME A LA NORME A L'ALINEA J. DES NORMES DE LA FDA EN MATIERE DE RAYONNEMENT CET APPAREIL EST CONFORME A L'ALINEA 15 DU REGLEMENT DE LA FCC. IL NE PEUT ETRE UTILISE QU'A CONDITION DE NE PAS PROVOQUER D'INTERFERENCE GENANTE. TELEVISEUR CABLECOMPATIBLE, CANADA.

MANUFACTURED/FABRIQUE

AUGUST /
AOUT
2002



ASSEMBLED IN / MC

MEXICO
120 VOLTS
60 Hz~
125 WATTS MAX

SERVICE NO. / No. de SERVICE

BA166C335B3060

27GT277TX51

MODEL / MODELE

27GT277

SERIAL NO. / No. de SERIE

C335B306Q

CHASSIS NO. / No. de CHASSIS

CTC203AF9

Exhibit B

THOMSON CONSUMER ELECTRONICS, INC.
10330 NORTH MERIDIAN STREET
INDIANAPOLIS, IN 46290-1024

RCA

THOMSON CONSUMER ELECTRONICS CANADA
THOMSON ELECTRONIQUE GRAND
PUBLIC du CANADA, INC.
PRESCOTT, ONTARIO

AVERTISSEMENT
RISQUE DE CHOCK ELECTRIQUE
NE PAS OUVRIR


WARNING
RISK OF ELECTRIC SHOCK
DO NOT OPEN



CONFORME A CFR, SOUS-ALINEA J, DES NORMES
DE LA FDA EN MATIERE DE RAYONNEMENT
CASQUE STEREO SOUSE LICENCE DE TELESONICS
BREVETS CANADIENS 1120582 ET 1145032.

TELEVISEUR CABLECOMPATIBLE RGR, PARTIE II, CANADA
ASSEMBLED IN / MONTE
JUAREZ, MEXICO
VOLTS: 120 WATTS (MAX)
Hz: 60

CHASSIS NO. / No. de CHASSIS
CTC175C2

LISTED TV RECEIVER/RECEPTEUR
 386H E7916

COMPLIES WITH FDA RADIATION PERFORMANCE
STANDARDS 21 CFR SUBCHAPTER J.
STEREO SETS LICENSED BY TELESONICS SYSTEMS
UNDER CAN. PATS. 1120582 AND 1145032.
CABLE COMPATIBLE TELEVISION APPARATUS,
CANADA GRR PART II

MANUFACTURED/FABRIQUE

AUGUST /
AOUT 1995
SERVICE NO. / No. de SERVICE

F19201BKTX2

MODEL / MODELE
F19201BK



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